

AB:JRS/VJM

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK
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UNITED STATES OF AMERICA

COMPLAINT

- against -

(18 U.S.C. § 1544)

MAFATA KROMA,

23-MJ-122

Defendant.

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EASTERN DISTRICT OF NEW YORK, SS:

CORRIE MADDEN, being duly sworn, deposes and states that he is a Special Agent with the United States Department of State, duly appointed according to law and acting as such.

On or about February 5, 2023, within the Eastern District of New York and elsewhere, the defendant MAFATA KROMA willfully and knowingly used a passport issued or designed for the use of another.

(Title 18, United States Code, Section 1544)

The source of your deponent's information and the grounds for his belief are as follows:¹

1. I am a Special Agent with the United States Department of State ("State") and have been involved in the investigation of numerous cases involving passport and visa fraud. I am familiar with the facts and circumstances set forth below from my participation in the

¹ Because the purpose of this Complaint is to set forth only those facts necessary to establish probable cause to arrest, I have not described all the relevant facts and circumstances of which I am aware.

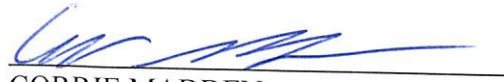
investigation; my review of the investigative file, including the defendant's criminal history record; and from reports of other law enforcement officers involved in the investigation.

2. On or about February 5, 2023, MAFATA KROMA arrived at John F. Kennedy International Airport on a flight from Turkey. Upon arrival, KROMA proceeded to screening by Customs and Border Protection ("CBP") and presented a United States passport in the name of another individual to a CBP officer. An automated passport control kiosk took a photograph of KROMA at the time she presented the United States passport for entry into the United States. The defendant's photograph triggered a facial recognition mismatch notification. Because of the facial mismatch, KROMA was directed to secondary inspection.

3. At the secondary inspection, CBP officers conducted an interview with KROMA. When CBP officers asked KROMA for her address, she provided an address that did not match the address on file for the individual whose United States passport KROMA presented to the CBP officer. Additionally, when CBP officers asked KROMA for the last four digits of her Social Security number, she could not provide them.

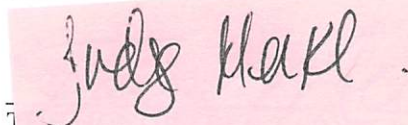
4. KROMA then admitted to the CBP officers that the passport she presented was not hers. When CBP officers asked KROMA how she came into possession of the passport, she stated that she had found it in Liberia.

WHEREFORE, your deponent respectfully requests that the defendant MAFATA KROMA, be dealt with according to law.



CORRIE MADDEN
Special Agent
United States Department of State

Sworn to before me this
6th day of February, 2023



EASTERN DISTRICT OF NEW YORK